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VIA ELECTRONIC MAIL AND HAND DELIVERY

Thomas Krueger
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United States Environmental Protection Agency
77 W. Jackson Blvd. (C-14J)
Chicago, Illinois 60604-3590

**Re: Comments of Fusibond Piping Systems, Inc.
U.S. EPA's Draft "Preliminary Planning Report"
Ellsworth Industrial Park Superfund Site**

Dear Mr. Krueger:

With this letter, Fusibond Piping Systems, Inc. ("Fusibond") submits comments to the U.S. EPA on the Draft Preliminary Planning Report ("PPR") issued on January 20 and 27, 2006 (in parts) concerning the Ellsworth Industrial Park Superfund Site. Fusibond's comments should not be construed as an admission, in whole or in part, of liability or responsibility for conditions in or about the Ellsworth Industrial Park Superfund Site. Nor should they be construed as an admission or acknowledgement, in whole or in part, that the Draft PPR is necessary or appropriate, that it complies with applicable laws, regulations and Agency guidance, or that it is consistent with the requirements of the Settlement Agreement and Order entered on or about September 29, 2005 or the Agreement in Principle (July 2003).

Fusibond believes that the sampling activities proposed on two properties in Study Area G are inadequate. Referring to Appendix C, Figure No. C-7 of the Draft PPR, Fusibond recommends that the U.S. EPA perform additional sampling in the areas described below:

- the property east of the DOWNERS GROVE NATIONAL BK property identified as 2537 CURTISS ST, hereinafter referred to as the "Ames Property," and
- the property south of the DOWNERS GROVE NATIONAL BK property and also identified as 2537 CURTISS ST, hereinafter referred to as the "Molex Parking Lot Property."

Ames Property

The following facts were reported in documents that were provided by the Ames Supply Co. ("Ames") to the Illinois EPA and the U.S. EPA in response to information requests:

- Ames used chlorinated solvents during its operational activities. (Source: EGSL Phase I, dated November 30, 2000, included with Ames' 104(e) response.)
- Material safety data sheets produced by Ames include products that contain trichloroethylene and 1,1,1-trichloroethane. Land disposal restriction notifications produced by Ames indicate other solvents were used by Ames, including tetrachloroethylene. (Source: Response to Subpoena Duces Tecum in *State of Illinois v. Lockformer*, dated March 21, 2001, included with Ames' 104(e) response.)
- A TCE degreaser was used by Ames for parts and tool washing in the center of the warehouse area. (Source: EGSL Additional Hydrogeologic Investigation Report, January 2002, obtained from IEPA via FOIA.)
- Wastes generated at the warehouse were stored in drums throughout the facility. The drums were then moved to a staging area prior to off-site disposal. (Source: EGSL Additional Hydrogeologic Investigation Report, January 2002, obtained from IEPA via FOIA.)
- Oil staining and "what appeared and smelled like remnants of chlorinated solvent" were observed in the expansion joints in the concrete floor of the Ames facility in the fall of 2000. (Source: EGSL Phase I, November 2000, included with Ames' 104(e) response.)
- Tetrachloroethylene was detected in an on-site soil sample at 78 ppb, exceeding Illinois' TACO cleanup objectives. (Source: EGSL Subsurface Investigation Report, July 2001, included with Ames' 104(e) response.)
- Trichloroethylene, tetrachloroethylene, and 1,1,1-trichloroethane were present in a groundwater sample from Ames' monitoring well MW-3. Tetrachloroethylene was detected at 140 ppb and trichloroethylene was present at 8.5 ppb, both exceeding Illinois' TACO cleanup objectives. Chlorinated solvents were also

found in soils during this investigation, with tetrachloroethylene detected at 119 ppb, above Illinois' TACO cleanup objectives, at the location of soil boring SB-1. (Source: EGSL Hydrogeologic Investigation Report, January 2002, obtained from IEPA via FOIA.)

Furthermore, based on a Salvage Management Plan submitted to the Downers Grove Sanitary District by Ames on September 24, 1992, which Fusibond obtained from the Downers Grove Sanitary District in response to a FOIA request, the following additional facts are known about Ames' operations:

- It was reported that up to 810 gallons of chlorinated solvent "would be on hand at a given time."
- The chlorinated solvents were stored in a chemical storage room along the west wall of the building.
- The chemical storage room was constructed with floor "scuppers," which were installed to provide a conduit for fluids to discharge from the room to outside the building.

The investigation of the Ames Property proposed by the U.S. EPA in the Draft PPR ignores many of the facts described above. The Draft PPR does not adequately address the probable source areas, does not utilize appropriate sampling methodology, and does not take advantage of an existing groundwater monitoring well network installed by Ames' environmental consultant. Fusibond proposes that the Draft PPR be amended to incorporate the following sampling activities on the Ames Property:

- 1) Actual soil samples should be collected underneath the foundation of the Ames' building, instead of the proposed sub-slab gas samples.
 - Two soil samples should be collected from beneath the floor in the chemical storage room.
 - Two soil samples should be collected from the former location of the TCE degreaser used for parts and tool washing, as reported by EGSL in its January 2002 Additional Hydrogeologic Investigation Report.
 - At least two soil samples should be collected from the expansion joint areas where "what appeared and smelled like remnants of chlorinated solvent" was observed by EGSL, as reported in its November 2000 Phase I Environmental Site Assessment Report.
- 2) Two soil borings should be completed outside of the building near the location of the chemical storage room's floor scuppers. At least one soil sample should be collected from each soil boring.

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- 3) A nested monitoring well pair should also be installed outside of the building near the location of the chemical storage room's floor scuppers. One well should be installed in the shallow water-bearing unit, and one well should be installed in the intermediate aquifer.
- 4) Groundwater samples should be collected from each of the monitoring wells that are already present on the Ames Property and from the proposed nested monitoring well pair.

Molex Parking Lot Property

The Molex Parking Lot Property was used as an unpaved parking area for several decades. Historically the property was used by Ames' employees, and more recently it has been used by employees of Molex Incorporated. Given that the Molex Parking Lot Property is located in an industrial park where the dumping of chlorinated solvents has allegedly occurred, and given that this area was once used by Ames, a company that used and distributed chlorinated solvents and whose operations caused the contamination of its own property, additional sampling should be performed.

The limited passive gas sampling proposed is inadequate to properly characterize the environmental conditions. Four soil borings should be completed, with at least one soil sample collected at each drilling location. In addition, two nested monitoring well pairs should be installed to more completely characterize the hydrogeology and groundwater quality of this portion of Study Area G. For each nested monitoring well pair, one well should be installed in the shallow water-bearing unit, and one well should be installed in the intermediate aquifer. Groundwater samples should be collected from each installed well.

Fusibond urges the U.S. EPA to amend the Draft PPR to include the sampling activities proposed above. With the collection of the additional data, the U.S. EPA will be better able to identify sources and define the nature and extent of contamination on the Ames Property and the Molex Parking Lot Property. If you have questions or would like to discuss anything in further detail, please do not hesitate to contact me.

Sincerely,



Brett D. Heinrich

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